



Order Filed on June 13, 2017  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in compliance with D.N.J. LBR 9004-2(c)**

**SCUR, WIGFIELD, HEYER,  
STEVENS & CAMMAROTA, LLP**  
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Wayne, New Jersey 07470  
Tel: 973-696-8391 Fax: 973-696-8571  
David Stevens, Esq. (Attorney ID 034422007)  
Counsel for the Debtor

In Re:

Pilgrim Medical Center, Inc. and  
Nicholas V. Campanella

Debtors.

Chapter 11

Case No.: 16-15414(VFP)  
Procedurally Consolidated

Judge: Vincent F. Papalia

**CONSENT ORDER VACATING STAY NUNC PRO TUNC**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby ORDERED.

**DATED: June 13, 2017**

A handwritten signature in cursive script, reading "Vincent F. Papalia".

Honorable Vincent F. Papalia  
United States Bankruptcy Judge

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Debtor: Pilgrim Medical Center

Adv. Pro. No. 16-1690

Caption of Order: **CONSENT ORDER VACATING STAY**

This matter having been brought before the Court by Scura, Wigfield, Heyer, Stevens & Cammarota, LLP, attorneys for Pilgrim Medical Center, Inc. and the Law Office of Jerome M. Douglas, attorneys for Dr. Nicholas Campanella (collectively, the “Debtors”) and Cullen and Dykman, LLP, attorneys for Jacqueline Jalil, Luisa Rojas, Tania Mena (collectively, the “Plaintiffs”); it appearing that the Plaintiffs obtained a judgment against the Debtors on December 4, 2015 (the “Judgment”) in the matter known as Jalil, et al. v. Pilgrim Medical Center, et al., bearing docket number ESX-L-7913-13 in the Superior Court of New Jersey; it appearing that the Debtor has prosecuted an Appeal (the “Appeal”) of the Judgment, and it appearing that on May 9, 2017, the New Jersey Appellate Division affirmed the Judgment, it appearing that the Plaintiffs have applied to the New Jersey Appellate Division for counsel fees as provided by the New Jersey Law against Discrimination, and it appearing that on or about May 24, 2017, the Debtors filed a Petition for Certification with the New Jersey Supreme Court, it appearing that all of the foregoing activities, to the extent they occurred post-petition, may constitute technical violations of the automatic stay, it appearing that the parties seek an order vacating the Automatic Stay *nunc pro tunc* regarding all aspects of the Appeal; and the Court taking notice of the parties consent to the form and entry of this order; and for good cause shown;

It is ORDERED as follows:

The automatic stay is hereby vacated, *nunc pro tunc*, to allow all aspects of the parties’ prosecution and defense of the Appeal to proceed, including the Plaintiffs’ requests for counsel fees and costs.

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Debtor: Pilgrim Medical Center

Adv. Pro. No. 16-1690

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We hereby consent to the form  
And entry of the within Order

SCURA, WIGFIELD, HEYER,  
STEVENS & CAMMAROTA, LLP  
Attorneys for Pilgrim Medical Center, Inc.

CULLEN AND DYKMAN, LLP  
Attorneys for Jacqueline Jalil,  
Luisa Rojas, and Tania Mena

By: /s/ David Stevens  
David L. Stevens, Esq.

By: /d/ David Edelberg  
David Edelberg, Esq.

LAW OFFICES OF JEROME M. DOUGLAS, LLC  
Attorneys for Nicholas V. Campanella

By: /s/ Jerome M. Douglas  
Jerome M. Douglas